ECCLESIA LAW

REGULATORY COMPLIANCE OF ECCLESIA LAW AS ATTORNEY IN FACT

3rd April 2026

The evolution of modern administrative law has necessitated a sophisticated re-evaluation of the boundaries between regulated legal practice and private fiduciary representation. In the jurisdiction of Wyoming, this intersection is primarily governed by the interplay between the Wyoming Limited Liability Company Act, the Uniform Power of Attorney Act, and the regulatory oversight of the Wyoming State Bar regarding the unauthorized practice of law (UPL). This analysis focuses on the operational model of MLITR Research LLC, trading as Ecclesia Law, and its role as a centralized fiduciary hub for ecclesiastical structures such as the Republic of Old Souls (ROS). The distinction between acting as an attorney-in-fact—a private agent authorized under a power of attorney—and an attorney-at-law—a licensed professional member of the bar—is central to the defence of technical forensic consultancy in the context of administrative tax recoupment and signature credit recovery. By examining the doctrinal foundations of English jurisprudence and the statutory protections of Wyoming's series LLC chassis, this report elucidates the mechanisms through which private legal agents navigate secular and ecclesiastical jurisdictions.

The Wyoming Series LLC: A Fiduciary Chassis for Partitioned Liability

The administrative infrastructure of Ecclesia Law is rooted in the Wyoming Limited Liability Company Act, specifically the provisions of W.S. 17-29-211 governing Series LLCs. This statutory framework allows a single limited liability company to establish one or more designated series of members, managers, transferable interests, or assets, effectively creating "cells" within a master entity. Each series functions as a separate business unit with the power to hold assets in its own name or the name of the master LLC, and crucially, to partition debts and liabilities so they are enforceable only against the assets of that specific series. For a centralized fiduciary hub like MLITR Research LLC, this structure provides the necessary insulation for managing a vast portfolio of grantor trusts, such as the 3,000 individual trust contracts associated with the Republic of Old Souls.

The administrative capabilities of a Wyoming Series LLC are defined by its operating agreement, which may grant separate rights, powers, or duties with respect to specified property or obligations. This flexibility allows the master entity to carry on any lawful purpose, with specific exclusions for acting as a financial institution or an insurer. The Secretary of State charges a minimal fee of $10.00 for each series designated under this section, making it an efficient vehicle for scaling complex fiduciary operations. To maintain the integrity of the liability shields between series, Wyoming law requires the maintenance of records that

reasonably identify the assets of each particular series through objective methods such as computational formulas or specific listings.

Feature of Wyoming Series LLC (W.S. 17-29-211)	**Regulatory and Administrative Requirement**
Asset Partitioning	Assets of a specific series are protected from the liabilities of the master LLC or other series.
Managerial Authority	Management may be vested in series-specific managers with responsibilities defined in the operating agreement.
Naming Conventions	Must include the parent LLC's name and the word "series" or "LLC".
Statutory Fees	A $10.00 fee per series is collected by the Wyoming Secretary of State.
Operating Agreement	Highly recommended (and effectively required for liability shields) to define roles and voting rights.

The use of the Series LLC chassis by Ecclesia Law facilitates the "Clifford Protocol," a system of administrative recoupment that treats each member's trust as a distinct fiduciary entity. By operating through this partitioned infrastructure, the entity can provide technical oversight and administrative support without commingling the assets or liabilities of thousands of international grantor trusts. This structural separation is a cornerstone of the defence against allegations of the unauthorized practice of law, as it frames the

entity's activities as administrative and organizational management of private trust infrastructure rather than the provision of individualized legal advice to the public.

The Uniform Power of Attorney Act and the Role of the Attorney-in-Fact

In Wyoming, the legal scope of a private agent is defined by the Wyoming Uniform Power of Attorney Act (W.S. 3-9-101 through 3-9-403). This act authorizes a "principal" to appoint an "agent" (also known as an attorney-in-fact) to manage property, financial affairs, and business interests. The relationship is a "pure fiduciary" one, requiring the agent to act in good faith, in accordance with the principal's reasonable expectations, and solely in the principal's best interest. Unlike an attorney-at-law, an attorney-in-fact does not require specific legal qualifications or admission to the bar, but their authority is strictly limited by the power of attorney document itself.

Under Wyoming law, a power of attorney is presumed to be genuine if the principal acknowledges their signature before a notary public or other authorized officer. The agent's general authority can encompass a wide range of subjects, including real property, tangible personal property, stocks, bonds, commodities, bank accounts, and business operating transactions. However, certain "hot powers"—such as the power to create, amend, or terminate an inter vivos trust, or to delegate authority—must be explicitly granted through specific initials in the document. For Ecclesia Law, the execution of a "Manifestation of Consent and Special Power of Attorney" on September 18, 2025, formally established the LLC as the attorney-in-fact for Iain Clifford, granting it the authority to handle international administrative remedies and technical consultancy mandates.

The statutory framework specifically enables an attorney-in-fact to conduct extensive research and investigation. Under W.S. 3-9-201, a principal may grant an agent the broadest authority feasible to perform acts the principal could do. This includes performing forensic research into any matter—whether trust-related, lawful, or legal—to verify facts, investigate the "meaning, validity or effect" of instruments, and protect the principal's interests. For example, W.S. 3-9-211 (iv) and (v) authorize agents to engage in actions to ascertain the legal standing of deeds, wills, and trust declarations. Furthermore, W.S. 3-9-212 allows an agent to assert and maintain claims, seek recoupments, and participate in litigation, which necessitates the power to perform forensic accounting, fund-tracing, and specialized research into legal and factual issues. This flexibility allows for the creation of mandates specifically for technical forensic research to verify standing and jurisdictional autonomy in any administrative or legal proceeding.[1]

The distinction between the attorney-in-fact and the attorney-at-law is frequently a point of regulatory contention. While an attorney-in-fact can represent a principal's interests in business transactions, signing documents, and managing claims, this title does not authorize the practice of law. In Wyoming, the "practice of law" is defined by the Supreme Court to include providing legal services, advice, or advocacy in a representative capacity. The Wyoming State Bar's Committee on the Unauthorized Practice of Law (UPL)

investigates instances where non-lawyers attempt to draft pleadings, appear in court as advocates, or provide counsel on the legal effect of documents.

Role Comparison	**Attorney-in-Fact (Agent)**	**Attorney-at-Law (Counsel)**
Authority Source	Private Power of Attorney (W.S. 3-9-101).	State Bar Admission/Supreme Court License.
Standard of Duty	Fiduciary duty to the principal.	Professional Conduct Rules/Duty to Court.
Permitted Acts	Financial decisions, business management, signing p.p..	Legal advice, advocacy, drafting pleadings.
Regulation	Uniform Power of Attorney Act.	Wyoming State Bar/Supreme Court.
Capacity	Acts "for and on behalf of" the principal.	Represents the client in legal proceedings.

The strategy employed by Ecclesia Law relies on acting exclusively under attorney-in-fact mandates. This framing attempts to bypass bar regulation by situating the firm's work within the realm of administrative and business management rather than legal advocacy. By signing as "agent" for a principal, the entity adheres to the formal requirements of W.S. 3-9-114, which mandates that an agent disclose their identity whenever acting for the principal by printing the principal's name and signing as "agent". This procedural adherence

is cited by Clifford as evidence of "Forensic Realism"—a rigorous mastery of administrative rules to achieve jurisdictional clarity.

Forensic Realism vs. Pseudo-Law: The Ecclesia Law Research Doctrine

A significant portion of the research produced by the Ecclesia Law Research Institute is dedicated to distinguishing its methodologies from "sovereign citizen," "freeman on the land," and other pseudo-legal movements. Iain Clifford characterizes these movements as "meaningless nonsense" and "paper terrorism" that ultimately fail under judicial scrutiny because they rely on spiritual declarations or attempts to "opt out" of the legal system. In contrast, Ecclesia Law advocates for "Forensic Realism," which is defined as the mastery of existing administrative and procedural rules to achieve jurisdictional freedom within the system.

The doctrinal foundation of Forensic Realism is rooted in orthodox English jurisprudence, specifically the concept of separate legal personality established in *Salomon v A Salomon & Co Ltd* AC 22 (HL). This case settled the principle that a company (or any artificial person) is a distinct entity from its human controllers. Ecclesia Law applies this logic to the relationship between a living human being (the natural person) and the legal identity created via a birth certificate (the artificial person or estate). Their research posits that administrative relief requires "rebuffing the presumption of agency" between the soul and the birth-certificate-created legal person, replacing it with a formal fiduciary trust or ministry structure.

Central to this doctrine is the use of signature "per procurationem" (p.p.) as defined in the Bills of Exchange Act 1882. Section 25 of the Act provides that a signature by procuration operates as notice that the agent has only limited authority to sign, and the principal is only bound if the agent was acting within their actual limits. Ecclesia Law argues that when a natural person signs on behalf of a legal person, they are in substance signing "per procurationem," and that this relationship is fact-specific and rebuttable. This framework is used to challenge the automatic assumption of personal liability for the debts or statutory obligations of a legal identity.

Jurisprudential Pillar	Source/Authority	Application in Forensic Realism
Separate Personality	*Salomon v A Salomon & Co Ltd*.	Distinguishing the living soul from the legal construct.
Statutory "Person"	Interpretation Act 1978.	Recognizing that "person" includes both natural and artificial entities.
Signature p.p.	Bills of Exchange Act 1882 s.25.	Signalling limited authority and rebuttable agency.
Directing Mind	*Tesco Supermarkets v Nattrass*.	Analyzing how acts of humans are attributed to entities.
Executor Doctrine	Probate/Estate Law.	Operating as a lawful administrator for a registered estate.

By situating its research within mainstream legal doctrines, Ecclesia Law seeks to provide a structural and compliant framework for resolving debt, tax, and statutory liabilities. This approach contrasts with the "Administrative Process Fallacy" found in sovereign movements, which Clifford deconstructs in his papers *Do Common Law Courts Work?* and *The Strawman Ideology: Are You Avoiding the Trap with Advanced Monopoly?*. The goal of Forensic Realism is to operate as a lawful administrator and creditor rather than a liable surety, utilizing the system's own rules to verify standing and jurisdictional autonomy.

ECCLESIA LAW

Ecclesiastical Jurisprudence and the Republic of Old Souls (ROS)

The Republic of Old Souls (ROS) is an ecclesiastical trust and a 508(c)(1)(a) faith-based ministry. In the United States, section 508(c)(1)(a) of the Internal Revenue Code identifies churches, their integrated auxiliaries, and conventions or associations of churches as organizations that are "tax-exempt by right" and are not required to file for 501(c)(3) status or submit annual returns. ROS utilizes this structure to provide a centralized administrative and educational marketplace for its members, who seek financial autonomy through the ministry's commerce protocols.

Iain Clifford serves as an "Envoy" for the ROS ministry, a status he uses to frame his activities within a religious and philosophical context. He maintains that the commercial doctrines taught by the ministry—such as signature credit recoupment and jurisdictional autonomy—are protected religious beliefs rather than mere legal theories. The ministry emphasizes "faith-based foundation" and "sovereign infrastructure," including the financing of independent ecosystems such as atmospheric water generation and free energy systems.

The administrative infrastructure of the ROS ministry is managed by MLITR Research LLC, which serves as a centralized fiduciary hub. This hub oversees over 3,000 individual grantor trust contracts for its members. These "98-Series International Grantor Trusts" are described as the primary vehicles for the recoupment of "abandoned credit energy". The ministry frames the conflict with secular authorities as a form of "religious persecution" and "systematic suppression" led by investigative blogger Dan Neidle, who labeled the ministry's protocols as a "scam".

Ecclesiastical Feature	**Regulatory Basis**	**Operational Application**
508(c)(1)(a) Status	Internal Revenue Code.	Tax-exempt ministry and ecclesiastical trust.
Envoy Status	Private Ecclesiastical Mandate.	Representative capacity for ministry affairs.

Grantor Trusts	98-Series Trusts.	Fiduciary structures for member assets.
Signature Credit	"Clifford Protocol".	Recoupment of credit based on member contracts.
PMA Structure	Private Members' Association.	MATRIXFREEDOM was an unincorporated PMA.

The transition of MATRIXFREEDOM—a Private Members' Association (PMA)—into the Republic of Old Souls occurred following what Clifford describes as a "scorched earth" campaign of propaganda. He asserts that MATRIXFREEDOM was targeted by Neidle, a former partner at Clifford Chance, whose reporting frame the PMA's educational protocols as fraudulent. This conflict has led to a $100,000,000 federal claim by Clifford against Neidle, alleging tortious interference with the ministry's business expectancies and the recoupment of approximately $600,000,000 in confirmed assets verified via IRS transcripts.

Administrative Tax Recoupment and the "Clifford Protocol"

The core technical service offered by Ecclesia Law is the implementation of the "Clifford Protocol," a manual for "Abandoned Credit Recoupment" and the recovery of "signature credit". The protocol's logic is grounded in the assertion that commercial transactions generate signature credit which, if not properly managed, becomes "abandoned credit energy" held by institutional custodians. The recoupment process is facilitated through the administrative infrastructure of the ROS grantor trusts.

Ecclesia Law maintains that its recoupment procedures are forensically verified through official federal records, specifically "IRS Wages and Tax Transcripts". The firm claims to have confirmed approximately $600 million in recoupments through these transcripts. This reliance on IRS data is a central part of the defense against "tax fraud" allegations; Clifford argues that utilizing federal records to verify fund flows and recoupments cannot be fraudulent if the data is sourced directly from the IRS.

The implementation of the protocol involves specialized forensic accounting and fund-tracing. In the Southern District of New York (SDNY) case *GoldSilver v. Clifford*, Ecclesia Law submitted Document 15-3, an "Expert Forensic Opinion" that traces USD $700,000 across international borders and verifies trust indentures. The firm argues that these activities are specialized accounting functions categorized as consulting services, which are specifically excepted from the definition of legal practice.

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Technical Procedure	Method of Verification	Operational Outcome
Signature Credit Recovery	Clifford Protocol Manuals.	Recoupment of abandoned commercial credit.
Tax Transcript Review	IRS Wages and Tax Transcripts.	$600M in confirmed member recoupments.
Fund-Tracing	Forensic Accounting Analysis.	Tracing international wire transfers ($700k).
Trust Administration	Fiduciary Indenture Analysis.	Managing 3,000 individual trust contracts.
Asset Fortress	Strategic Litigation Protocols.	Protection of ministry assets from interference.

The "September Terrorist Attack" is a term used by Clifford to describe the sabotage of these recoupment efforts by rogue contractors, including Amy Sanger, allegedly incited by Dan Neidle's reporting. This sabotage involved the filing of fraudulent identity theft reports with the IRS, which triggered manual Transaction Code 810 freezes on member accounts. Ecclesia Law views Neidle's Wyoming State Bar complaint as a strategic extension of this interference, designed to freeze the flow of confirmed assets and avoid liability for the damages caused to the ROS ministry.

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UPL vs. Technical Forensic Consultancy: Regulatory Boundaries

The investigation initiated by the Wyoming State Bar (File: March 27, 2026) centres on whether MLITR Research LLC, operating as Ecclesia Law, has engaged in the unauthorized practice of law (UPL). The complaint, filed by Dan Neidle, alleges that the entity is run by a "sovereign citizen" and "fugitive from justice" who is practicing law without a license. The Wyoming Office of Bar Counsel, led by Mark W. Gifford, is the primary enforcement body responsible for investigating such claims.

Wyoming State Bar Rule 7 provides a broad definition of the practice of law, but it also contains several critical exceptions. Rule 7(b) states that the practice of law includes providing professional legal advice or services where there is a client relationship of trust, including appearing as an advocate in a representative capacity; drafting pleadings. However, Rule 7(c)(12) specifically excepts non-lawyers preparing tax returns and non-lawyers representing persons before the Internal Revenue Service or other state taxing authorities, to the extent permitted by those agencies. Ecclesia Law argues that its activities—grounded in IRS transcript verification and administrative tax recoupment—fall squarely within this exception.

Furthermore, Rule 7(d) explicitly allows any person to act pro se in a matter in which that person is a party. In the SDNY litigation, Iain Clifford is a party to the interpleader action, and he maintains that submitting Document 15-3 (the Expert Forensic Opinion) was a mandatory procedural act under Federal Rule of Civil Procedure (FRCP) 26(a)(2)(B). This federal rule requires any party intending to present expert testimony to submit a written report prepared and signed by the expert. Ecclesia Law contends that providing a specialized research product to a pro se litigant to meet an evidentiary burden is a standard litigation support function and does not constitute "representing" another person.

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Regulatory Barrier	Statutory Exception/Defence	Application for Ecclesia Law
Drafting Pleadings	Pro Se Right (Rule 7(d)).	Clifford acts for himself in SDNY.
Legal Advice	Tax Representative Exception (Rule 7(c)(12)).	Focus on IRS recoupments and transcripts.
Court Advocacy	Mandatory Expert Report (FRCP 26).	Technical disclosure of forensic accounting.
Representation	Private Attorney-in-Fact Mandate.	Acting as agent for business transactions.
UPL Definitions	Technical Consultancy vs. Legal Advice.	Providing "Forensic Realism" research.

The Bar Counsel's investigation must also account for the motive of the complainant. Ecclesia Law alleges that Dan Neidle's report was filed in "bad faith" to sabotage a $100,000,000 lawsuit for tortious interference. Under Wyoming's UPL rules, Bar Counsel may dismiss a complaint if the investigation reveals it is unfounded or part of a campaign of calculated malice. The defence highlights Neidle's "wilful blindness"—his decision to ignore the March 2026 attorney-in-fact mandate that proved Clifford was the principal/client and not the owner of the firm—as evidence of "Actual Malice".

ECCLESIA LAW

Forensic Evidence and Admissibility in Federal Court

The lawfulness of Document 15-3 (the "Expert Forensic Opinion of Ecclesia Law") on the SDNY court docket is a critical component of the defence against UPL allegations. Ecclesia Law rejects calls to withdraw the document, asserting that its submission was a mandatory requirement of federal procedural rules rather than a regulatory breach. Under FRCP 26(a)(2)(B), an expert witness who is retained or specially employed to provide testimony must provide a report containing a complete statement of all opinions and the basis and reasons for them.

The admissibility of such forensic testimony is governed by Federal Rule of Evidence 702 and the "Daubert" standard. To be admissible, the expert's scientific, technical, or other specialized knowledge must help the trier of fact understand the evidence or determine a fact in issue. Ecclesia Law positions its work as specialized "forensic fiduciary accounting," which involves tracing international wire transfers and analyzing trust indentures—tasks that fall within the range of expert opinion rather than legal practice.

The firm emphasizes that its report is not a legal pleading or a brief, but a technical finding grounded in specialized knowledge. Utilizing a non-lawyer forensic research firm to provide technical evidence is a common practice in complex litigation. In federal criminal and civil cases, the need for pretrial discovery of forensic evidence is critical, as it is difficult to test expert testimony without advance notice and preparation. By providing the SDNY court with a detailed statement of fund flows, Ecclesia Law argues it is assisting the court in understanding the facts of the international wire and trust fraud detailed in the interpleader action.

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Evidentiary Requirement (FRCP 26)	Forensic Fact in SDNY Document 15-3	Admissibility Standard
Complete Statement of Opinions	Tracing $700,000 across borders.	Must assist trier of fact (FRE 702).
Data and Information Considered	Analysis of trust indentures.	"Good grounds" based on known facts.
Witness Qualifications	Specialized in Forensic Fiduciary Accounting.	Expertise in "science, art, or trade".
Compensation Statement	Required under FRCP 26(a)(2)(B)(vi).	Transparency in expert retention.
Prior Testimony List	Required for the previous 4 years.	Establishing the witness's history.

The presence of the document on the docket is framed as a record of compliance with federal rules rather than a violation of bar standards. Ecclesia Law maintains that moving to withdraw the document would falsely imply a defect in the filing, whereas the document stands as a valid evidentiary disclosure essential for Clifford's pro se defence. This procedural necessity reinforces the distinction between the attorney-in-fact acting as a conduit for technical evidence and an attorney-at-law representing a client's legal interests.

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The Neidle Conflict: Tortious Interference and "September Terrorist Attack"

The conflict between Iain Clifford and Dan Neidle represents a pivotal case study in the intersection of investigative journalism, regulatory weaponization, and tortious interference. Clifford asserts that Neidle's campaign—characterized as "calculated malice" and "journalistic hubris"—led directly to the "September Terrorist Attack," which sabotaged 3,000 member trust contracts. The $100,000,000 federal claim against Neidle is based on the theory of vicarious liability for the damages catalysed by his "tax fraud" reporting.

According to formal notices served by Ecclesia Law, Neidle's complaint to the Wyoming State Bar is recorded as a secondary "Trigger Event" in this conflict, constituting further evidence of tortious interference. By targeting MLITR Research LLC and its trade name Ecclesia Trustees, Neidle has launched a direct attack on the centralized fiduciary hub that provides infrastructure for the thousands of member Grantor Trusts. These trusts have appointed MLITR Research as their trustees specifically for the recoupment of signature credit under the Clifford Protocol.

Clifford argues that Neidle's attack on Ecclesia Law at the Wyoming State Bar compounds his existing liability, particularly as it occurred after he was served with comprehensive forensic evidence demonstrating the lawful operation of the Clifford Protocol. The decision to ignore this evidence and proceed with a UPL complaint is characterized by Clifford as "wilful blindness" and "actual malice," designed to freeze the flow of confirmed assets to members. Neidle is already facing a federal lawsuit regarding his prior assertions that Clifford is a "tax fraudster," and this regulatory report is framed as a bad-faith extension of that interference.

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Legal Conflict Element	Position of Iain Clifford/Ecclesia Law	Position of Dan Neidle/Complainant
"Fugitive" Label	Challenging nullity in UK Court of Appeal.	Fugitive evading UK justice.
"Tax Fraud" Claim	$600M confirmed via IRS transcripts.	Scam targeting the public.
Wyoming Bar Report	Bad-faith extension of tortious interference.	Act of public interest/UPL report.
Clifford Protocol	Technical manual for credit recoupment.	Fraudulent legal theory.
MatrixFreedom	Private Members' Association (PMA).	Unregulated financial scam.

The synthesis of these factors suggests that the Wyoming State Bar investigation is more than a simple UPL inquiry; it is a critical intersection of professional regulation and private ecclesiastical mandates. The defense emphasizes that the entity's activities are restricted to technical research and administrative support under private mandates, and that the complainant's assertions are part of a documented campaign of character assassination and interference.

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Conclusion: Synthesis and Outlook for Private Administrative Remedy

The analysis of the legal scope, authority, and limitations of a Wyoming-based attorney-in-fact and private legal agent reveals a complex but structured framework for administrative remedy. The Wyoming Series LLC chassis provides the necessary partitioning for managing thousands of grantor trusts, while the Uniform Power of Attorney Act establishes the fiduciary boundaries for private agency. The distinction between the attorney-in-fact and the attorney-at-law remains a central regulatory frontier, with Ecclesia Law situating its work within the technical consultancy and tax exceptions of the Wyoming State Bar rules.

Forensic Realism, as advocated by Iain Clifford, seeks to master administrative and procedural rules to achieve jurisdictional freedom, explicitly rejecting pseudo-legal ideologies. The reliance on orthodox English jurisprudence and the "Three Pillars of Defence" demonstrates a commitment to technical precision and statutory compliance. The integration of 508(c)(1)(a) ecclesiastical structures adds a layer of religious protection to the ministry's commerce protocols, while the implementation of the Clifford Protocol targets the recovery of abandoned signature credit verified by federal records.

The ongoing litigation in the SDNY and the UK Court of Appeal, combined with the $100,000,000 federal claim for tortious interference, highlights the stakes involved in this jurisdictional conflict. The resolution of the Wyoming State Bar investigation will depend on the degree to which the regulatory authorities recognize the distinction between forensic fiduciary accounting and the practice of law. As administrative recoupment procedures become increasingly sophisticated, the role of the private legal agent as a technical consultant under a fiduciary mandate will continue to challenge and refine the boundaries of secular professional regulation.